



# SEPA Request-to-Pay Scheme Rulebook 2024 CHANGE REQUEST PUBLIC CONSULTATION DOCUMENT

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until 9 June 2024

# SRTP Scheme Rulebook



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## 1 Introduction

It is a key objective of the EPC that the SEPA Request-to-Pay (SRTP) scheme is able to develop with an evolving payments market. To meet the demands of the scheme participants and stakeholders including end-users and Service Providers (SP) communities, the SRTP scheme is subject to a change management process that is structured, transparent and open, governed by the rules of the management and evolution function of SEPA Scheme Management.

This SRTP Scheme Rulebook 2024 Change Request Public Consultation Document details:

- Change requests submitted by stakeholder representatives including SP communities and by the EPC's ad-hoc RTP Task Force (RTP TF) for possible modifications to be introduced into the next version (v4.0) of the SRTP scheme rulebook.
- RTP TF recommendations on the way forward with regard to the individual change requests.

The EPC submits this document for public consultation in accordance with the procedures set out in the SRTP scheme rulebook (for further details please check section 4.2 'Maintenance and Evolution (change management process)').<sup>1</sup>

**The public consultation period will run from 12 March until 9 June 2024.**

All interested parties with a legitimate interest are encouraged to provide feedback on the possible changes to be introduced into the next version of the SRTP scheme rulebook by returning the completed response template (EPC029-24) to [srtp@epc-cep.eu](mailto:srtp@epc-cep.eu) **by 9 June 2024 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.**

*Note: The EPC at all times reserves the right to make changes to the SRTP scheme rulebook deemed necessary in order to ensure that the SRTP scheme rulebook complies with applicable EU legislation and amendments thereto.*

## 2 Change request review procedure

In accordance with section 4.2.4.1 of the SRTP scheme rulebook, the RTP TF analysed (a) whether the change as suggested in a change request fall within the scope of the SRTP scheme and (b) whether the change proposed by the change request is a:

- A minor change: a change of an uncontroversial and usually technical nature that facilitates the comprehension and use of the rulebook, or;

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<sup>1</sup> Link to the SRTP scheme rulebook version v3.2:

<https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-request-pay-scheme-rulebook-version-v32>



- A major change: a change that affects or proposes to alter the substance of the rulebook and the scheme.

All change requests that comply with the published EPC template for change requests and with the section 4.2.4.1 of the rulebook have been included in this document.

As required by the SRTP scheme rulebook, the RTP TF has issued a recommendation on the way forward with regard to each change request. Each recommendation reflects one of the following options:

- a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request becomes part of the scheme and the rulebook is amended accordingly.
- c) The change request **should be included in the scheme** as an **optional feature**:
  - The new feature is optional, and the rulebook will be amended accordingly;
  - Each scheme participant<sup>2</sup> may decide to offer the feature to its customers, or not.
- d) The change request **is not considered fit for the SEPA geographic area**.
- e) The change request **cannot be part** of the scheme for one of the following reasons:
  - It is technically impossible or otherwise not feasible (to be explained on a case-by-case basis);
  - It is out of scope of the scheme.

### 3 Overview Change Requests to the SRTP scheme Rulebook v3.2

The EPC received a total of 19 change requests, categorised as follows:

- 18 major change requests (for detailed information see section 4).
- 1 minor change requests.

The original change requests documents that were submitted to the EPC can be found in Annex 1.

The below table lists all the received change requests (CR):

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<sup>2</sup> A participant which has formally adhered to the scheme.



CR item	Minor or Major	Topic	Contributor	Recommendation of the RTP TF on the proposed way forward. The final decision is subject to the outcome of the public consultation.
1	Major	New file for Corporates containing the result of RTPs exchanged regarding their payments (SCTs or SCT Ints)	Spanish Banking Community	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - <b>option e.</b>
2	Major	New reason code for Refusal by the Payer in AT-R004	Spanish Banking Community	Should be incorporated into the scheme - <b>option b.</b>
3	Major	New message to inform the Payee of the initiation/execution of the payment in Pay Later use cases	Spanish Banking Community	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - <b>option e.</b>
4	Major	New reason codes in AT-R004 for non-acceptance of the Request to Pay in the case of e.g., "Instalment payments"	Spanish Banking Community	Should be incorporated into the scheme - <b>option b.</b>
5	Major	Not showing totally or partially Payee's IBAN to the Payer	Spanish Banking Community	Should be incorporated into the scheme - <b>option b.</b>
6	Major	B2B invoicing	Pine & Cone Oy	Should be incorporated into the scheme - <b>option b.</b>
7	Major	Possible changes related to the future ViDA regulation	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
8	Major	Not accepted Payee new reason code	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
9	Major	Spam management	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
10	Major	New reason code to respond to a cancellation request	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
11	Major	Allow the Payer to pay later, after due date	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
12	Major	Addition of Sealing requirements in the ASF	RTP TF	Should be incorporated into the scheme - <b>option b.</b>



CR item	Minor or Major	Topic	Contributor	Recommendation of the RTP TF on the proposed way forward. The final decision is subject to the outcome of the public consultation.
13	Minor	Addition of examples in the API specifications	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
14	Major	Extension of Enrolment/Activation processes	RTP TF	The market is invited to provide its opinion and suggestions in relation with this topic which will then be assessed by the EPC Board.
15	Major	API sandbox and MVPs	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
16	Major	Definition of reachable Payers and Payees and of the discovery service	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
17	Major	Possible required alignments with the payment schemes	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
18	Major	Additional attributes linked to the Instant Payment Regulation	RTP TF	Should be incorporated into the scheme - <b>option b.</b>
19	Major	Simplify the SRTP scheme homologation process	RTP TF	Should be incorporated into the scheme - <b>option b.</b>





## 4 Detailed Analysis of Major Change Requests to the SRTP scheme Rulebook v3.2

4.1 # 1: New file for Corporates containing the result of RTPs exchanged regarding their payments (SCTs or SCT Insts).

### 4.1.1 Description

This change request was provided by the Spanish Banking Community.

It proposes to create a new ISO20022 message that can be used in the Customer to Bank space (Payee – Payee’s RTP & Payment Service Provider) in order to allow the Payee’s RTP & Payment Service Provider to facilitate reconciliation to Big Corporates and inform them about the actual result of RTPs sent in bulk within a specific period of time (day, week, month). Therefore, this new ISO message should be able to compose a bulk file, and from its fields should be easily derived whether each RTP sent has been confirmed, accepted, rejected, refused, cancelled, updated or, most importantly, paid.

This proposal tries to cover the Payee’s need to be informed about the actual results of RTPs with regard to their corresponding payments when they have been sent in high volumes within a specific period of time (day, week, month). The main aim is to facilitate to our Clients the reconciliation amongst RTPs and SCTs/SCT Insts when they have been transmitted in bulk via their PSPs.

### 4.1.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that this request for a reporting message is out of the scope of the SRTP scheme and more linked to the payment schemes. Due to SRTP transaction cycle, the SRTP would be over when the reporting should be generated.

However, this service could be offered by the SRTP Service Providers outside the scope of the SRTP scheme. If necessary, additional fields could be added in the SRTP messages to be used in this reporting.

Therefore, the RTP TF recommends not taking forward the change request - **(option e)**.

### 4.1.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.2 # 2: New reason code for Refusal by the Payer in AT-R004

### 4.2.1 Description

This change request was provided by the Spanish Banking Community.

Due to the lack of experience regarding fraud in this new scheme, and in order to give more tools of protection to the Customer/Payer, it proposes to add and acknowledge “Suspicion of fraud” as a new reason code for Refusal by the Payer in AT-R004, and not only allow the chance of Reject for this reason to the Service Providers.

It means an additional reason code for non-acceptance of the Request to Pay by the Payer in attribute AT-R004.

### 4.2.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that this code could indeed be useful.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.2.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



4.3 # 3: New message to inform the Payee of the initiation/execution of the payment in Pay Later use cases.

#### 4.3.1 Description

This change request was provided by the Spanish Banking Community.

It proposes to include a new message, in addition to the acceptance of the SRTP, that can be exchanged the moment after the payment has been made in Pay Later use cases.

Whenever the use case is a combination of Accept Now – Pay Later, the information of the initiation or execution of the payment cannot be conveyed to the Payee in the actual moment when it is made, because the acceptance (with its attribute AT-R114 ‘Payment initiation status related information’, foreseen to contain the payment information) has theoretically been issued long ago. The same applies to Accept Later – Pay Later, when the moment of the acceptance and the payment differ. In that way, the Payee loses track of the payment when it may be needed the most: in Accept Now – Pay Now the information of the payment status may not be that necessary since the payment may arrive within seconds with an SCT Inst or, at most, the day after with an SCT, whereas in Pay Later the payment may arrive any time within a specific period. For this reason, we would find it most convenient to incorporate a new message apart from the acceptance that can be exchanged the moment after the payment has been made in the Pay Later use cases. The flow of the information to the Payee with regard to the payment would then be complete.

#### 4.3.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that there are already existing messages to confirm the execution of a payment, but it is outside the scope of the SRTP scheme.

It would not be possible to include this in the SRTP scheme due to the life cycle of the SRTP messages that would be already finished when the reporting should be generated.

Therefore, the RTP TF recommends not taking forward the change request - **(option e)**.

#### 4.3.3 Rulebook impact

If this change request is supported, this will at least impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



4.4 # 4: New reason codes in AT-R004 for non-acceptance of the Request to Pay in the case of e.g., “Instalment payments”.

#### 4.4.1 Description

This change request was made by the Spanish Banking Community.

Even though “Instalment payments” and “Credit note” are scheme options that do not have to be mandatorily supported by all SRTP scheme Participants, and the Reject of SRTP message is allowed in these cases according to the SRTP scheme Clarification Paper (Annex III), there is no specific reason code in the rulebook for those Rejects. A dedicated code should be added within attribute AT-R004 (‘Reason code for non-acceptance of the RTP’) with the rest of the codes foreseen to reject an SRTP message.

This change request proposes to add new reason codes in AT-R004 ‘Reason code for non-acceptance of the RTP’ for non-acceptance of the SRTP in the case of the use of a scheme option.

#### 4.4.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that a new generic reason code "Option not supported" could be created for that purpose.

The RTP TF however notes that when the EPC Directory Service (EDS) will be launched, the scheme participants will be able to see the options that are supported or not by the SRTP Service Providers and shall therefore not send SRTP messages with non-supported options.

The RTP TF recommends including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### 4.4.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



#### 4.5 # 5: Not showing totally or partially Payee's IBAN to the Payer.

##### 4.5.1 Description

This change request was made by the Spanish Banking Community.

It proposes not to show totally or partially the Payee's IBAN to the Payer.

In the context of the researches carried out with Corporates/Utilities Providers with the aim of discovering their demands regarding RTP, they have expressed unanimously their need to prevent the consumers from being able to visualise Payees' IBANs nor in SRTP nor in SCTs/SCT Insts issued after SRTP's approval. The reason would be to avoid the risk that their accounts might be used at a different moment with other purposes than to be credited for the debt specifically requested at that time. In such a way, they would be sparing potential problems of conciliation.

As observed, there are already e-commerce solutions in the market requesting a payment where Payee's IBAN is never shown to the Payer, even if the payment itself is an SCT Inst, and this does not diminish in any case the functionality nor the traceability of the operation since the Payment Service Providers are the ones in charge of preserving and exchanging the full data of the operation from end-to-end. Another example of this are SDDs collections, where the Payer does not see where their money is finally credited. What's more, taking into account that there already exists in SRTP the mandatory attribute AT- E005 "Payee's identification code" to allow Payee's recognition by the Payer, we believe that not showing totally or partially Payee's IBAN to the Payer would mean no harm to Payers and a great convenience for Payees.

##### 4.5.2 RTP TF analysis and recommendation

The RTP TF believes that this is part of the commercial relationship between the Payer's SRTP Service Providers and the Payers. The Payer's SRTP Service Providers could decide not to show the Payee's IBANs (totally or partially) since they can decide bilaterally with the Payers which of the attributes will be presented to them, depending on the nature of the Customer and the channel used.

In case this should be a choice made by the Payees, the RTP TF suggests providing an optional hint (i.e., an additional optional attribute) from the Payee to the Payer's SRTP Service Provider not to show its IBAN. The Payer's SRTP Service Provider would be free to take this hint into account or not.

The IBAN remains mandatory in the inter-SRTP Service Providers space.

Therefore, the RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

##### 4.5.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.6 # 6: B2B invoicing

### 4.6.1 Description

This change request was made by Pine & Cone Oy.

It proposes to include new optional data elements for structured invoice information in DS-01, DS-02 and DS-03e .

### 4.6.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that more optional data element in the SRTP message could be included in the next version of the SRTP scheme rulebook, however more details about the fields that should be added should be provided.

Since the change request CR#7 also proposes the possibility to attach e-invoices to the SRTP messages, the RTP TF proposes to only add the number of bills, the amount free of charge, and the VAT in the SRTP messages.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.6.3 Rulebook impact

If this change request is supported, this will at least impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.7 # 7: Possible changes related to the future ViDA regulation

### 4.7.1 Description

This change request was provided by the RTP TF.

It proposes to make the SRTP scheme compatible with the European standard on e-Invoicing (EN16931) and the coming ViDa (VAT in the Digital Age) regulation.

The attachment attribute should be mandatorily supported by all the SRTP Service Providers in the SRTP and Credit Notes SRTP messages.

Additional reason codes for the non-acceptance of the SRTP could be added, such as "Type of attachment not supported" or "Attachment maximum size exceeded".

The SRTP messages could be adapted to include all the necessary data required to ensure a real-time e-reporting.

### 4.7.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that attachment attribute should be mandatorily supported by all the SRTP Service Providers, but only in the cases of e-invoicing and credit notes. The accepted format types would be the standard e-invoices formats (i.e., UBL, CII XML, FacturX).

New reason codes for the non-acceptance of the SRTP, such as "Type of attachment not supported" or "Attachment maximum size exceeded" could be added.

With regard to the e-reporting, the RTP TF believes that the topic is not clear and stable enough to determine which fields would be required.

The RTP TF suggests including the changes related to e-invoicing into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.7.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.8 # 8: Not accepted Payee new reason code

### 4.8.1 Description

This change request was provided by the RTP TF.

It proposes to include a new reason code for 'unknown' SRTP messages.

An SRTP message is considered as 'unknown' when the Payer's SRTP Service Provider does not think/know that an activation has been done with this specific Payee.

In this case, the SRTP SP should be able to reject the SRTP message and indicate that the reason of the rejection is "Unknown Payee".

Today, the Payer is already able to use this code to refuse an SRTP message. In the future, the Payer's SRTP SP should also be able to use this code.

It would be an additional protection for the Payers.

### 4.8.2 RTP TF analysis and recommendation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.8.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.





## 4.9 # 9: Spam management

### 4.9.1 Description

This change request was made by the RTP TF.

It proposes to create a new attribute and a new process to allow the Payees to insert a specific code/reference in their first SRTP message to a specific Payer to inform the Payer's SRTP Service Provider that an activation with this Payer has been done outside the scope of the SRTP scheme.

The Payer and its SRTP SP should agree on a way to create specific codes/references that the Payer could share during the activation processes with new Payees. For example, as part of the enrolment process done between the Payer and its SRTP SP, the SRTP SP could provide some codes/references that the Payer could share when it proceeds with the activation of a new Payee.

The Payer should be able to give one different code to each Payee activated outside the scope of the SRTP scheme.

As part of the activation process done between the Payee and the Payer outside the scope of the SRTP scheme, the Payer and the Payee would agree on a specific code or reference to be used by the Payee in its first SRTP message sent to this Payer.

In this way, the Payer's SRTP SP will be able to differentiate a valid SRTP message from a spam one.

The activation after a one off, could be equivalent to "card on file" where the Payer accepts that the Payee keeps his SRTP address.

It should be further analyse whether the Payer's SRTP SPs should respond to the spammers that their messages have been rejected.

### 4.9.2 RTP TF analysis and recommendation

The RTP TF is of the view that the process should be further described and clarified. In particular, the references to be used should be defined, a new specific field to include these references should be created, and all the use cases should be covered (e.g., when a QR code is flashed).

A new optional attribute "Activation reference" should be created.

In addition, a new reject reason code "Activation reference not valid" should be added in the list of reason codes for a reject by the Payer's SRTP Service Provider, attribute AT-R004 'Reason code for non-acceptance of the RTP'.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.9.3 Rulebook impact

If this change request is supported, it will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



#### 4.10 # 10: New reason code to respond to a cancellation request

##### 4.10.1 Description

This change request was provided by the RTP TF.

Following the receipt of a request for cancellation, the Payer's SRTP Service Provider should be able to include in its negative answer to the Payee's SRTP SP that the original SRTP has already been accepted and can therefore not be cancelled anymore. A new reason code "Already accepted RTP" should be added to the list of codes to be used in the attribute 'Reason code for non-acceptance of the RfC of the RTP' (AT-R112).

The RTP TF should then assess the need to remove the reason code "Payment already transmitted for execution", as this would always happen after the acceptance.

##### 4.10.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that in the attribute 'Reason code for non-acceptance of the RfC of the RTP' (AT-R112), the reason code "Payment already transmitted for execution" should be replaced by "Already accepted RTP".

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

##### 4.10.3 Rulebook impact

If this change request is supported, it will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



#### 4.11 # 11: Allow the Payer to pay later, after due date

##### 4.11.1 Description

This change request was provided by the RTP TF.

It proposes to allow the Payer which has already accepted an SRTP, to pay later, after due date and inform the Payee accordingly.

In case a Payer has already accepted an SRTP message but realizes that it will not be able to execute the payment on the agreed execution date, there should be a standardised way to inform the Payee that the payment will be done later.

However, the payment should still be done before the Expiry date of the SRTP.

##### 4.11.2 RTP TF analysis and recommendation

The RTP TF points out that after acceptance, the life cycle of an SRTP message is terminated. Therefore it is not possible to change the response afterwards.

However, the RTP TF suggests a workaround which is to refuse the SRTP and use a new refusal code "Requested Execution Date of the payment not accepted" in the attribute AT-R004 'Reason code for non-acceptance of the RTP'.

The RTP TF suggests including the proposed workaround into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

##### 4.11.3 Rulebook impact

If those change requests are supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.12 # 12: Addition of Sealing requirements in the ASF

### 4.12.1 Description

This change request was provided by the RTP TF.

It proposes to add Sealing / non-repudiation requirements in the SRTP scheme rulebook and in the API Security Framework to provide the proof that an API client has indeed submitted a given request and vice versa an API server has indeed provided a given response.

### 4.12.2 RTP TF analysis and recommendation

The RTP TF points out that for the scheme participants, this would have a cost, a lot of work would be necessary since there is no international standard norm, and new certificates would be required.

It should be determined whether all fields should be covered by Sealing or only some specific fields.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 4.12.3 Rulebook impact

If this change request is supported, it will at least impact the rulebook, the API Security Framework and the SRTP related API specifications.



#### 4.13 # 14: Extension of Enrolment/Activation processes

##### 4.13.1 Description

This change request was provided by the RTP TF.

It proposes to extend the Enrolment/Activation (E/A) processes into a possible stand-alone scheme.

The Enrolment/Activation messages are the standardisation of message services and are successfully implemented in different areas in the world (e.g., Canada, Argentina, South Africa, Singapore) for RTP purposes.

Today on the market, it seems that there are no other E/A standards, even outside the payments sector (e.g., in Telecommunications, IT, etc). Therefore, based on the SRTP scheme E/A processes, the EPC could possibly define an E/A standard/scheme:

- general enough to be used by other EPC schemes (e.g., SPAA, CoP, ...)
- either based on the usage of XML ISO20022 messages or on APIs, based on RESTful APIs and JSON Objects.

The detailed description of the E/A processes and the related Datasets could be removed from the SRTP scheme rulebook which could refer to a new stand-alone ad-hoc overlay scheme. .

##### 4.13.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that a new scheme would be outside the scope of the SRTP scheme, however if there is a market interest and subject to the approval of the EPC Board, should this change request be implemented, some changes would be required in the SRTP scheme to separate the Enrolment and Activation processes.

The RTP TF suggests to separate the features from the use of the ISO messages.

The market is invited to provide its opinion and suggestions in relation with this topic which will then be assessed by the EPC Board.

##### 4.13.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



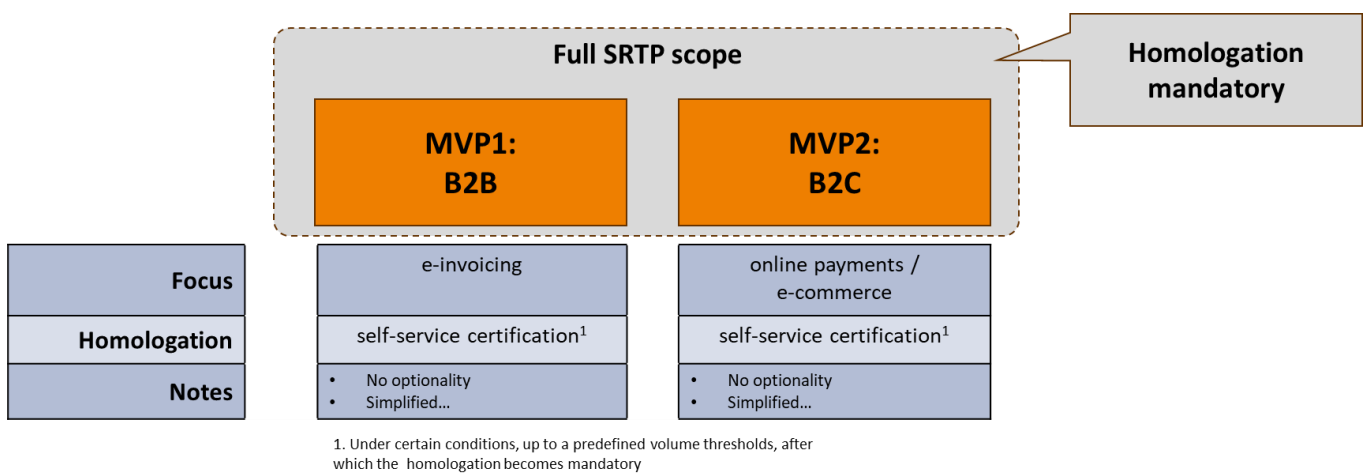
#### 4.14 # 15: API sandbox and MVPs

##### 4.14.1 Description

This change request was provided by the RTP TF.

It proposes on one hand to make an API sandbox, including a self-service certification, available to the SRTP scheme applicants. This would reduce the errors and timing needed to homologate, and it could also be used for a self-service certification under certain conditions to be determined (e.g., below a specific volumes threshold...) and for a specific period of time.

On the other hand, the SRTP scheme could be divided into two Minimum Viable Products (MVPs): B2B and B2C, in addition to the full SRTP scheme scope.



The participants could choose one MVP only and would then have to support all the functionalities/options included in the selected MVP. They should ensure reachability and interoperability within this MVP. In this case and subject to certain conditions, only a self-service certification (e.g., through an API sandbox) would be required. The required tests in the API sandbox would depend on the MVP selected.

A full membership, with choice of options, would also still be possible. Mandatory features must be respected.

The EPC could indicate in the Register of Participants (RoP) the MVP for which a participant is reachable. This information would also be stored by the default EPC Directory Service (EDS).

##### 4.14.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that the content of each MVP should be defined and the conditions of the self-service certification should be determined.

The RTP TF encourages the market to propose other MVPs if required beside the B2B and the B2C ones.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**, and mentions that some parts of this change requests (i.e. the API sandbox) could be implemented before the effective date of the next version (v4.0) of the SRTP scheme rulebook.



#### 4.14.3 Rulebook impact

If this change request is supported, it will at least impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



#### 4.15 # 16: Definition of reachable Payers and Payees and of the discovery service

##### 4.15.1 Description

This change request was provided by the RTP TF.

It proposes to further define the concept of “Reachable” / “Reachability” and add a “discovery service”.

It should be clarified that it is possible to adhere to the SRTP scheme and reserve it only to some clients (category of clients, clients that have subscribed to a product, etc...).

The discovery service should ensure that a Payee/Payer has a way to know whether a Payer/Payee can use the SRTP services.

Today, the Payees/Payers have no automated way to know whether a Payer/Payee is enrolled. There should be a service for the Payees/Payers (e.g., along with B2B invoicing, to replace a reject SDD,...) to discover the SRTP address from the data the Payee/Payer already has from his Payer/Payee.

When the discovery is successful, the Payee/Payer can follow with an “activation request” (in or out of the SRTP scheme) to be sure that the Payer accepts to receive SRTP messages from this Payee.

The Payee/Payer would send as the “search key” the knowledge elements it has from the Payer/Payee (e.g., IBAN) and would get as a result either “not found” or the SRTP address of the Payer/Payee.

For privacy reasons, a Payer may request NOT to be “discoverable” and use only the SRTP services at his own initiative.

Also, to avoid spam of “fishing of SRTP addresses” a possible solution would be to allow the use of the discovery service only to the Payees that are already in relation with the Payer (e.g., whitelist), or to “reliable parties” (e.g., taxes), etc.

##### 4.15.2 RTP TF analysis and recommendation

The RTP TF is of the opinion that this service could be offered inside or outside the scheme, the discovery service should only be accessible to well enrolled Payees/Payers, the key for the discovery service should be determined, and in a first step, only the Payees could be queried via the discovery service.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

##### 4.15.3 Rulebook impact

If this change request is supported, this would at least impact the rulebook.





#### 4.16 # 17: Possible required alignments with the payment schemes

##### 4.16.1 Description

This change request was provided by the RTP TF.

It proposes to include Changes resulting from an alignment with the payment schemes.

- i. Structured / hybrid addresses  
Introduce a hybrid address version by November 2025 alongside a structured address version and the hybrid address has no expiration date.  
Allow the unstructured address version until November 2026.  
The hybrid address: is a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements and up to two lines of 70 characters of unstructured "Address Line" <AdrLine>. The structured elements for "Country" <Ctry> and for "Town Name" <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.
- ii. Effective date + time on the Rulebook  
Align the effective date of the SRTP scheme with the one of the payments schemes (i.e., Sunday 16 November 2025)  
Add a effective time similar to one of the SCT Inst and OCT Inst schemes (i.e., Time effective: 03:30:00.000 CET)
- iii. Extension of Character Length for Name  
Extend the character length for the 'Name' fields from 70 to 140 characters
- iv. Addition of ultimate Payee/Payer's name (and addresses) in the SRTP transactions
- v. Optional use of Unique End-to-end Transaction Reference (UETR)  
Introduce the UETR as a yellow-shaded optional attribute.  
All participants must be able to accept, process and transmit the UETR further into the inter-SRTP SP space
- vi. Unique Format of Acceptance Date Time Timestamp  
Amend the Implementation Guidelines (IGs) to specify the number of digits allowed to represent milliseconds in the Date Time Timestamp.  
One format of the "ISODate Time" should be specified for the Date Time message element in every SRTP message. SRTP SPs can then rely on a unified rule to track and reconcile their messages.

##### 4.16.2 RTP TF analysis and recommendation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b) in case those changes are included in the next version of the Payment schemes rulebooks.**

##### 4.16.3 Rulebook impact

If this change request is supported, it will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



## 4.17 # 18: Additional attributes linked to the Instant Payment Regulation (IPR)

### 4.17.1 Description

This change request was provided by the RTP TF.

It proposes to change the description/definition of the name of the Payee and trade name of the Payee attributes to facilitate the future mandatory IBAN Name check.

Today, the “Name of the Payee” (AT-E001) is a mandatory field in an SRTP message. But the “Trade Name of the Payee” (AT-E002) is optional.

The description of the “Name of the Payee” only states: “The information should reflect the name of the Payee (which can be different from the Trade Name)”.

In the future, the descriptions/definitions of the attributes “Name of the Payee” and “Trade Name of the Payee” should be further detailed to comply with the IPR and should make a distinction between natural and legal persons.

It should be clarified that:

- For natural persons, the first name and last name should be mandatory.
- For legal persons, the legal name or trade name should be mandatory (one or the other).

### 4.17.2 RTP TF analysis and recommendation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)** to comply with the IP Regulation.

### 4.17.3 Rulebook impact

If this change request is supported, it will impact the rulebook, the Implementation Guidelines and the SRTP related API specifications.



#### 4.18 # 19: Simplify the SRTP scheme homologation process

##### 4.18.1 Description

This change request was provided by the RTP TF.

It proposes to simplify the SRTP scheme homologation process, and to this end, remove the simplified B and A+B homologations since the homologation of the Referenced Technical Solution Provider (RTSP) should be enough to ensure the required level of security.

##### 4.18.2 RTP TF analysis and recommendation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)** and mentions that this change requests could already be implemented by the end of 2024.

##### 4.18.3 Rulebook impact

If this change request is supported, it will not the rulebook, but only the adherence and homologation processes.



## 5 Detailed Analysis of Minor Changes to the SRTP scheme Rulebook v3.2

For this release management cycle, the following minor change has been raised:

Section	Description	Reason for change	Type of Change
SRTP related API Specifications	Addition of examples	This would make the implementation of the API and the testing easier	Clarification

## 6 Next steps

The contributors to this public consultation are invited to inform whether they support or not each of the change requests and/or the related RTP TF recommendation via response template EPC029-24 by **9 June 2024 (17h00 CET)**. Comments may also be provided.

The RTP TF shall collect and analyse the support for each change request and the comments received from all the contributors and shall develop its change proposals based on the comments received from the public consultation.

The RTP TF will consolidate the change proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in the Change Proposal Submission Document which will be submitted to the EPC Board for decision-making purposes.

The Change Proposal Submission Document shall be published on the EPC website along with the decision of the Board on each change proposal.

Approved change requests will be incorporated into the version 4.0 of the SRTP scheme rulebook and published in November 2024 with the intention that they become effective in November 2025.



## Annex 1 – List of original Change Request documents



Consolidated list of  
CR to the SRTTP schem